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Hillsboro, Oregon 97124  
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Docket Coordinator, Headquarters  
USEPA CERCLA Docket Office, 520IG  
1200 Pennsylvania Avenue, NW  
Washington, D.C. 20460

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Environmental Cleanup Office

Dear Person:

The following are my comments regarding the "EPA Proposes Portland Harbor to National Priorities List, August 2000". I am assuming that placing the harbor on a priorities list is the next step after EPA's previous proposal to designate it as a National Superfund Site.

All of this may seem logical, proper, and necessary to people who sit in distant offices and make far reaching decisions based on computer data and read-out charts. But it is sorely lacking in validity and substance if you take a holistic view of the harbor, the Willamette River, its basin, and the beneficial uses now served without apparent stress or identified harm.

The EPA has listed the recognized beneficial uses but nowhere has there been shown any harm to these uses because of minuscule concentrations of noxious substances in bottom sediment deposits. Instead, the EPA has developed a data analysis of a local matter than can and will be managed, if proven necessary, at the state and local level. For example, metals are listed as toxicants, but the EPA fails to recognize that some of them occur naturally in the river basin.

On a comparison basis, Portland is one of the few major harbors in the world which operates in harmony with other non-port uses. There have been no identified impediments to migrating fishes, either adults or young, since 1969 when low dissolved oxygen concentrations plagued them during late summer. That problem was corrected by local effort long ago.

These migratory fish have, however, been decimated by "over-harvesting". On the contrary, there are great numbers of resident fish from numerous species perpetually in the Portland Harbor. They neither require management nor do they receive much recreational attention. Their presence certainly must be given recognition in any harbor evaluation. Neither EPA nor the Oregon Department of Environmental Quality (DEQ) have given recognition to these other species. I do not believe there is any evidence of a fish problem in the harbor.

Recreational use of the harbor, including water contact users, is now greater than it has ever been. Yet, there is no public health record of increased water borne diseases or irritations. For obvious public health reasons, however, river users are cautioned against drinking untreated river water. This would be true for any river, anywhere. Incidentally, Oregon's human health records show that the recreational river user has a far greater chance of drowning than suffering harm from pollutants. Perhaps we should shift more attention to water related safety.

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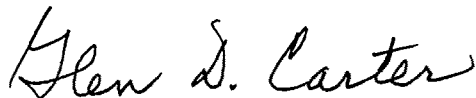
What is the EPA planning to do with the river sediments and shoreline soils that don't fit their standards? These sediments cannot be covered or capped in place at the river bottom and still comply with river disposal regulations. Also, such action would hinder maintenance dredging of the navigation channel. Hauling sediments away from the river to distant disposal sites merely transfers the problem to a new site, hardly an environmental gain. In fact there is the potential for the hauling to create more air pollution problems in a city with already existing air pollution problems. Additionally, the role of natural forces in winter floods will make it difficult to manage caps in the river channel as water accretes and erodes the bed and shorelines.

Because the river system is functioning satisfactorily under present conditions, why do we need to list it? Oregon's job should be to go forward with the understanding and requirement that conditions will not be allowed to worsen. Necessary "housekeeping chores" can be handled on an "as needed" basis under State of Oregon rules and leadership. A river management program of this type would also hold down some of the horrendous costs that result from environmental "overkill".

As a professional fish and aquatic biologist I have been involved in the water quality issues of the Willamette River from 1951 to date. Thirty two of those years, from 1956 to 1988, I worked for the DEQ as a Water Pollution Analyst. Before that, I worked on a Ph. D. thesis (never finished) on "Biological Indicators of Pollution in the Willamette River", while attending Oregon State University. I also have a masters degree in Fish and Game Management. I was directly involved in the pollution abatement work to "Clean Up the Willamette" from the mid-1950's until I retired.

Thank you for this opportunity to comment on the proposal to list the Willamette Harbor in the National Superfund Listing. A wise and balanced approach to this issue will be much better for the EPA, the DEQ, the State of Oregon and the paying public.

Sincerely,



Glen D. Carter

cc     Senator Gordon Smith  
       Senator Ron Wyden  
       Representative David Wu  
       Governor John Kitzhaber  
       EPA Region X, Chip Humphrey  
       Oregon DEQ, Mike Rosen